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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 RAMON MALDONADO, JR.,
15 Defendant.

CASE NO. 1:23-CR-169 JLT-SKO
STIPULATION AND ORDER REGARDING
EXCLUDABLE TIME PERIODS UNDER SPEEDY
TRIAL ACT
DATE: August 21, 2024
TIME: 1:00 p.m.
COURT: Hon. Sheila K. Oberto

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17 STIPULATION

18 1. By previous order, this matter was set for status on August 21, 2024.

19 2. By this stipulation, defendants now moves to vacate the status conference and set the
20 matter for trial on March 4, 2025, and to exclude time between August 21, 2024, and March 4, 2025,
21 under Local Code T4.

22 3. The parties agree and stipulate, and request that the Court find the following:

23 a) Counsel for defendant MALDONADO desires additional time to review the plea
24 agreement with the defendant, consider additional supplemental discovery recently produced,
25 conduct further investigation, and, if unable to resolve, prepare for trial.

26 b) Counsel for defendant believes that failure to grant the above-requested
27 continuance would deny him the reasonable time necessary for effective preparation, taking into
28 account the exercise of due diligence.

1 c) The government does not object to the continuance.

2 d) Based on the above-stated findings, the ends of justice served by continuing the
3 case as requested outweigh the interest of the public and the defendant in a trial within the
4 original date prescribed by the Speedy Trial Act.

5 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
6 et seq., within which trial must commence, the time period of August 21, 2024 to March 4, 2025,
7 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
8 because it results from a continuance granted by the Court at defendant's request on the basis of
9 the Court's finding that the ends of justice served by taking such action outweigh the best interest
10 of the public and the defendant in a speedy trial.

11 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
12 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
13 must commence.

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1 IT IS SO STIPULATED.
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Dated: August 15, 2024

PHILLIP A. TALBERT
United States Attorney

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5 /s/ KAREN A. ESCOBAR
6 KAREN A. ESCOBAR
7 Assistant United States Attorney
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Dated: August 15, 2024

/s/ Alekxia L. Torres Stalling
Alekxia L. Torres Stalling
Counsel for Defendant
Ramon Maldonado, Jr.

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12 ORDER
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15 IT IS SO ORDERED.
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DATED: 8/16/2024

Sheila K. Oberto
The Honorable Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE